

EXHIBIT B

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

231407-06

X
MDL Docket No. 1629

In re: NEURONTIN MARKETING,
SALES PRACTICES AND PRODUCTS
LIABILITY LITIGATION

Judge Patti B. Saris

Magistrate Judge
Leo T. Sorokin

THIS DOCUMENT RELATES TO:

RUTH SMITH, as Executrix for the Estate
of RICHARD H. SMITH, Deceased

PLAINTIFF'S
SUPPLEMENTAL
RULE 26(a)(1)
DISCLOSURES

05C1311

X
SIRS:

PLEASE TAKE NOTICE, that pursuant to FRCP Rule 26(a)(1):

(A) The following witnesses may be used to support the claims of the plaintiff, herein:

1. Police and ambulance personnel who responded to/investigated the incident;
2. Neurontin prescribing physician Dr. Paul R. McCombs at Neurosurgical Associates, 4230 Harding Rd, Suite 303, Nashville, TN 37205;
3. Neurontin prescribing physician Dr. Edward S. Mackey Jr. 4230 Harding Rd, Suite 1000, Nashville, TN 37205;
4. Physicians and staff personnel at Heritage Medical Associates, 2325 Crestmoore, Nashville, TN 37215, including Dr. James Jones;
5. Physicians and staff personnel at Spaulding & Nesbitt Urology Clinic, 345 23rd Ave N, Suite 212, Nashville, TN 37203, including Dr. Tom E. Nesbit;
6. Physicians and staff personnel at Tennessee Orthopaedic Alliance, 301 21st Ave N, Nashville, TN 37203, including Dr. Stewart Stowers;
7. Physicians and staff personnel at Otolaryngology Associates of Tennessee, 2410 Patterson St, Suite 210, Nashville, TN 37203, including Dr. Mowery;

8. Physicians and staff personnel at Neurological Surgeons, 2410 Patterson St, Suite 500, Nashville, TN 37203;
9. Physicians and staff personnel at Willowbrook Home Health Care, 2 International Plaza Dr, Suite 425, Nashville, TN 37217;
10. Physicians and staff personnel at University Medical Center, 1411 W Baddour Parkway, Lebanon, TN 37087;
11. Physicians and staff personnel at Baptist Hospital, 2000 Church st, Nashville, TN 37236, including Dr. John Anderson;
12. Physicians and staff personnel at Centennial Medical Center, 2300 Patterson St, Nashville, TN 37203;
13. Dr. Douglas Waldo at Heart & Vascular Clinic, 240 Patterson St, Suite 215, Nashville, TN 37203;
14. Dr. David N. Dyer, 2200 Murphy Ave, Suite B, Nashville, TN 37203;
15. Dr. William B. Harwell Jr., 1900 Patterson St, Suite 205, Nashville, TN 37203;
16. Dr. Burton F. Elrod, at Southern Sports Medicine, 2021 Church St, Suite 200, Nashville, TN 37203;
17. Dr. Michael T. Santi at Colon & rectal Surgery Associates, 240 Patterson St, Suite 201, Nashville, TN 37203;
18. Dr. Frank Berklaclich, 4230 Harding Rd, Suite 805, Nashville, TN 37205;
19. Dr. Carl Hampf, 300 20th Ave N, Suite 506, Nashville, TN 37203;
20. Dr. James Cato, 222 2nd Ave N, Nashville, TN 37203;
21. Christopher L. Woods, DDS, 1502 17th Ave South, Nashville, TN 37212;
22. Dr. Thomas Stasko, Vanderbilt Dermatology Clinic, 1301 22nd Ave S, Suite 3903, Nashville, TN 37232;
23. Dr. Rex Arendall, Neurological Associates, 345 23rd Ave N, Suite 420, Nashville, Tn 37203;
24. Dr. Daryl Kaswinkel, Loden Vision Center, 907 Rivergate Parkway, Suite C2020, Goodlettsville, TN 37072;
25. Dr. Edwin Regen, address unknown;
26. Friends and family of the deceased.

(B) The following documents may be used to support the claims of the plaintiff herein:

1. Death certificate, annexed;
2. Police report – previously served 8/8/06;
3. Ambulance report and bill;
4. Dr. James Cato – records, annexed;
5. Dr. Edward Mackey, Jr. – records, annexed;
6. Dr. Carl Hampf – records, annexed;
7. Dr. Frank Berklaclich – records, annexed;
8. Dr. Paul McCombs - records, annexed;
9. Christopher Woods, DDS – records, annexed;
10. Dr. Daryl Kaswinkel – records and bills, annexed;
11. Heritage Medical Associates – records and bills, annexed;

12. University Medical Center – records, annexed;
14. Eckerd Drugs – records, annexed;
15. Records obtained from the Franklin vs. Parke-Davis litigation;
16. Records obtained from the United States of America vs. Warner-Lambert Company LLC litigation, including but not limited to, the global criminal and civil settlement agreement resolving Warner-Lambert's criminal and civil liability regarding the marketing of the drug Neurontin for uses not approved by the United States Food and Drug Administration;
17. Records obtained from the defendant in the course of discovery.

(C) Computation of Damages:

Plaintiff claims damages for wrongful death.

(D) Insurance Agreements:

Not applicable to the plaintiff.

Dated: August 27, 2006

FINKELSTEIN & PARTNERS, LLP



MARSHALL P. RICHER, ESQ.
Attorneys for Plaintiff
436 Robinson Avenue
Newburgh, N.Y. 12550

TO:
DAVIS POLK & WARDWELL
Attorneys for Defendants
450 Lexington Avenue
New York, NY. 10017